

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TRACEY WHITE, et al.,	)	
	)	
Plaintiffs	)	
	)	
v.	)	Cause No. 14-cv-01490 - HEA
	)	
THOMAS JACKSON, et al.,	)	
	)	
Defendants.	)	

**MEMORANDUM IN SUPPORT OF ST. LOUIS COUNTY DEFENDANTS' MOTION  
TO COMPEL DISCOVERY DIRECTED TO PLAINTIFFS KAI AND SANDY BOWERS**

COME NOW Defendants Jon Belmar, Sgt. David Ryan, P.O. Terence McCoy, P.O. Michael McCann, Det. Derik Jackson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, P.O. Daniel Hill, P.O. Antonio Valentine, and St. Louis County, and for their Memorandum in Support of their Motion to Compel Plaintiffs Kai Bowers and Sandy Bowers to Answer Defendants' First Interrogatories and respond to Defendants' First Request for Production of Documents, state as follows:

The above listed defendants propounded their First Interrogatories and First Request for Production of Documents on Plaintiffs Kai Bowers and Sandy Bowers on July 23, 2015. Plaintiffs have not responded to the discovery requests to date. Defendants certify to the Court in accordance with Rule 37(a)(1) Fed.R.Civ.P. that they have in good faith conferred with plaintiff's counsel about the discovery responses. On August 21, 2015, Defendants' counsel had a conference call with all three of plaintiffs' attorneys to discuss a variety of discovery issues. During the call, plaintiffs' counsel advised that they did not expect Kai or Sandy Bowers to timely respond to Defendants' First Interrogatories or First Request for Production of Documents, and consented to Defendants filing the instant Motion to Compel at this time.

Rule 37(a)(1) permits upon notice to others, a party to move for an order compelling disclosure. Because defendants have complied with the requirements of the rule, they ask the Court to direct Plaintiffs Kai Bowers and Sandy Bowers to answer the First Interrogatories and respond to the First Request for Production of Documents propounded on July 23, 2015.

WHEREFORE, for the above stated reasons, Defendants Jon Belmar, Sgt. David Ryan, P.O. Terence McCoy, P.O. Michael McCann, Det. Derik Jackson, Det. Aaron Vinson, Det. William Bates, Det. Nicholas Payne, P.O. Daniel Hill, P.O. Antonio Valentine, and St. Louis County ask this Court to grant their Motion to Compel, and order Plaintiffs Kai Bowers and Sandy Bowers to Answer Defendants' First Interrogatories and respond to Defendants' First Request for Production of Documents.

PETER J. KRANE  
COUNTY COUNSELOR

/s/ Priscilla F. Gunn  
Michael E. Hughes #23360MO  
Associate County Counselor  
[Mhughes2@stlouisco.com](mailto:Mhughes2@stlouisco.com)  
Priscilla F. Gunn #29729MO  
Assistant County Counselor  
[Pgunn@stlouisco.com](mailto:Pgunn@stlouisco.com)  
41 S. Central, Ninth Floor  
Clayton, MO 63105  
(314) 615-7042  
(314) 615-3732 (fax)

#### CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was sent by the Court's electronic filing system to all attorneys of record this 1<sup>st</sup> day of September, 2015.

/s/ Priscilla F. Gunn